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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

In re NAVIENT CORPORATION SECURITIES LITIGATION	Master File No. 17-8373 (RBK/AMD)  <b>SUPPLEMENTAL DECLARATION OF JESSE WAYNE PRITCHARD</b>
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I, Jesse Wayne Pritchard, declare as follows:

1. I respectfully submit this declaration in support of Plaintiffs' Motion for Final Approval of Settlement. I have personal knowledge of the statements herein and if called upon as a witness, could and would competently testify thereto.
2. I previously submitted a declaration in support of Plaintiff's Motion for Preliminary Approval of Settlement which described my involvement in this case, beginning with its commencement and continuing through settlement. I adopt those statements and incorporate them herein as if they were set forth below.
3. I continue to support the approval of the settlement. As explained in my prior declaration, the settlement amount of \$7,500,000 represents a favorable outcome in the litigation given the obstacles we faced in terms of establishing liability and damages before a jury. Those issues included in pertinent part whether the public already knew about Navient Corporation's alleged misconduct at the start of the Class Period and, therefore, were effectively on notice of the risks pertaining to the "forbearance steering" claims. Additionally, although Navient Corporation recently settled certain State Attorney General litigation, it continues to fight the Consumer Financial Protection Bureau's lawsuit. The outcome of that case could have had significant ramifications on this matter, potentially negative.
4. I also still support my attorneys' request for an award of fees and reimbursement of expenses. The case was litigated extensively. My attorneys incurred significant out-of-pocket expenses and invested heavily in time, effort and resources to achieve the result at hand. They should be compensated as requested, which is an award of fees in the amount of \$2,500,000 which is one-third of the settlement fund plus reimbursement of their out-of-pocket expenses not to exceed

\$1,000,000.

5. I am support an award for myself to reimburse me for the time and costs I incurred in serving as a class representative. My involvement in this lawsuit dates back to December 15, 2017 when I first moved to be appointed as the lead plaintiff. I have since spent over 130 hours working with my attorneys on this matter. I participated in document discovery by obtaining records relating to my investments, which was difficult to do given that I had to physically locate many of the records being sought. I also sat for a deposition in connection with the class certification proceedings. I reviewed most if not all documents and pleadings filed in this case and discussed these materials with my attorneys. In exchange for my time and effort serving as the class representative, I am seeking an award of \$15,000 which I believe is fair and deserved.

6. I was primarily employed as a sales specialist during the course of this action. I have a Master of Business Administration degree from Nova Southeastern University. I am 76 years old. The time I devoted to this action was time that I otherwise would have spent working and focusing on my other retirement investments. I believe that the requested amount of \$15,000 approximates the time and effort I spent serving as the lead plaintiff and class representative in this action.

I declare under penalty of perjury that the foregoing is true and correct.  
Executed this 4th day of March 2022.



JESSE WAYNE PRITCHARD